

US EPA ARCHIVE DOCUMENT

Long Term Control Plan Template for Small Communities

The LTCP Template (LTCP EZ) for Small Communities is a CSO planning tool for communities whose LTCPs have not been developed or are not in compliance with the 1994 CSO Policy. The LTCP EZ builds upon NMC implementation and provides step-by-step instructions towards completing an LTCP. The simple forms can be completed by hard copy or computer.

The LTCP EZ addresses the full scope of the LTCP requirements, including characterization, monitoring and modeling, and the evaluation of alternative portions of the Policy.

LTCP EZ is a voluntary planning tool and is not a guidance document. The template is not intended to replace statutory and regulatory requirements applicable to CSOs. EPA is not prescribing the Presumption Approach over the Demonstration Approach. The Presumption Approach presented in the template may only be applied where, in light of available data regarding such CSOs, it is likely to meet the water-quality based standards of the CWA.

For information on how to obtain a copy of LTCP EZ, please contact Michael Sullivan at 202-833-9140.

For More Information:

CSO Policy

<http://cfpub.epa.gov/npdes/cso/cpolicy.cfm>
<http://www.epa.gov/npdes/pubs/owm0111.pdf>

Guidance for NMCs

<http://www.epa.gov/npdes/pubs/owm0030.pdf>

Guidance for LTCPs

<http://www.epa.gov/npdes/pubs/owm0272.pdf>



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Combined Sewer Overflows



A Guidance for Small Communities

What is a Combined Sewer Overflow?

A Combined Sewer Overflow (CSO) is a discharge from a combined sewer system (CSS) at a point prior to the POTW treatment plant. CSOs are point sources subject to National Pollutant Discharge Elimination System (NPDES) permit requirements including both technology-based and water quality-based requirements of the Clean Water Act (CWA).

How are CSOs Regulated?

CSOs are regulated by NPDES permits and the CWA in accordance with the 1994 CSO Policy. The Policy is intended to provide guidance to permittees with CSOs, permitting authorities, state water quality standards authorities, and enforcement authorities.

Objectives of the CSO Policy:

- To ensure that if CSOs occur, they are only as a result of wet weather
- To bring all wet weather CSO discharge points into compliance with the technology-based and water quality-based requirements of the CWA
- To minimize water quality, aquatic biota, and human health impacts from CSOs

Nine Minimum Controls

All NMCs must be continually operated, maintained, and properly documented before, during, and after the implementation of the LTCP.

Long Term Control Plan

The purpose of the LTCP is to develop and evaluate a range of CSO control alternatives sufficient to meet water quality standards. The following are the minimum elements associated with the LTCP:

1. Characterization, Monitoring, and Modeling of the Combined Sewer System;
2. Public Participation;
3. Consideration of Sensitive Areas;
4. Evaluation of Alternatives;
5. Cost/Performance Considerations;
6. Operational Plan;
7. Maximization of Treatment at the existing POTW;
8. Implementation Schedule for CSO Controls; and
9. Post-Construction Compliance Monitoring Program.

Small System Considerations

At the discretion of the NPDES Authority, jurisdictions with populations under 75,000 may not need to complete each of the formal steps outlined in the Policy, but should be required through their permits or other enforceable mechanisms to comply with the following components:

- Continued Implementation of the Nine Minimum Controls;
- Public Participation;
- Identification of Sensitive Areas; and
- Post-Construction Monitoring.

Permittees are encouraged to discuss the scope for their LTCP with the water quality standards authority and the NPDES authority. These discussions will ensure that the plan includes sufficient information to enable the permitting authority to identify the appropriate CSO controls.